

ILLINOIS COMMERCE COMMISSION

DATA REQUEST

REQUEST NUMBER IRCA 6.01—6.12

Requested of Company Representative: James R. Hargrave

Company: Verizon North Inc. and Verizon South Inc. ("Verizon")

Docket No.: 00-0812

Date Submitted: 05/25/2002

Date Response: 06/14/2002

**IRCA 6.09** At lines 1127-1129 of his surrebuttal testimony, Mr. Tucek states that Mr. Hendricks has not demonstrated that ICM's modeling of customer locations is inaccurate. For the purpose of proving that ICM's modeling of customer locations is accurate, please take a statistically significant random sample of exchanges in Verizon's Illinois network and compare the actual customer locations for those exchanges to the customer locations modeled/assumed by ICM for these same exchanges. Please use the results of this analysis to develop maps of the exchanges with actual customer locations clearly labeled on paper-stock undersheets and the customer locations modeled/assumed by ICM clearly labeled on see-through overlay sheets.

**RESPONSE:**

Verizon does not have the information requested. Verizon objects to the request to the extent it requires Verizon to conduct a study to create the information requested.

**OFFICIAL FILE**

ILL. C. C. DOCKET NO. 00-0812

IRCA CROSS EXHIBIT No. 10

Witness \_\_\_\_\_

Date 8-1-02 Reporter lgr

Provided by: James R. Hargrave  
Job Title: Director — Regulatory & Government Affairs  
Telephone: (309) 663-3124